

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re:

LECLAIRRYAN PLLC,

Debtor.

Lynn L. Tavenner, as Chapter 7 Trustee,

Plaintiff,

vs.

ULX Partners, LLC and UnitedLex Corporation

Defendants.

Chapter 7

Case No. 19-34574 (KRH)

Adv. Pro. 20-03142 (KRH)

NOTICE OF MOTION AND HEARING THERON IF NECESSARY

PLEASE TAKE NOTICE that Defendants ULX Partners, LLC, ULX Manager, LLC, and UnitedLex Corporation (collectively, “**Defendants**”), by counsel, have filed a *Motion to Seal Settlement Agreement and Related Documents, Information, and Hearings* (the “**Motion**”) [Docket No. 207 in Case No. 20-03142 and Docket No. 1325 in Case No. 19-34574].

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion carefully and discuss it with your attorney if you have one in this Chapter 7 Case. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE that on September 4, 2019, the Court entered the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [ECF. No. 38] (the “**Case Management Order**”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “**Case Management Procedures**”). The Case Management Procedures, among other things, prescribe the manner in which Objection must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written request to mckee@gtlaw.com, or, for a fee, at <http://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, on or before **May 23, 2022 (the “Objection Deadline”)**, you or your attorney must:

File with the Court, either electronically or at the address shown below, a written response to the Motion pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing at the address of the clerk below, you must mail it early enough so the Court will **receive** it on or before the Objection Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion as conceded and enter an appropriate order granting the requested relief without further notice or hearing.

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection is received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that the Court will entertain the Motion on **May 25, 2022, at 11:00 a.m.** (or such time thereafter as the matter may be heard). In connection with the same, the undersigned will appear before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge. Due to the COVID-19 public health emergency, no in-person hearings are being held. This hearing will take place remotely through Zoom on the date and time scheduled herein. To appear at the hearing, you must use the following Zoom registration link:

<https://www.zoomgov.com/meeting/register/vJltfuivqTwsG0w7NNm3z511H7Q0KnjY2W8>

Listen-only conference line[s]:

Dial: 1-866-590-5055
Access Code: 4377075
Security Code: 52522

Dated: May 11, 2022

Respectfully submitted,

/s/ David G. Barger
David G. Barger (VSB No. 21652)
Thomas J. McKee, Jr. (VSB No. 68427)
Greenberg Traurig, LLP
1750 Tysons Boulevard, Suite 1000
McLean, Virginia 22102
Telephone: (703) 749-1300
Facsimile: (703) 749-1301
Email: bargerd@gtlaw.com

mckeet@gtlaw.com

and

J. Gregory Milmoe (admitted *pro hac vice*)
Greenberg Traurig, LLP
One International Place, Suite 2000
Boston, MA 02110
Telephone: (617) 310-6064
Email: milmoeg@gtlaw.com

*Counsel ULX Partners, LLC, ULX
Manager, LLC,
and UnitedLex Corporation*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of May, 2022, a true and correct copy of the foregoing document was served via first class mail and/or electronic mail upon: (i) all parties and counsel requesting service via the Court's ECF system, (ii) the Office of the United States Trustee, (iii) Special Counsel to Lynn L. Tavenner, Chapter 7 Trustee, (iv) the 20 largest unsecured creditors as listed on the Debtor's schedules, and (v) the Service List as defined by the governing Case Management Order and filed by counsel to the Chapter 7 Trustee.

/s/ David G. Barger

David G. Barger (VSB No. 21652)
Greenberg Traurig, LLP
1750 Tysons Boulevard, Suite 1000
McLean, Virginia 22102
Telephone: (703) 749-1300
Facsimile: (703) 749-1301
Email: bargerd@gtlaw.com

*Counsel to ULX Partners, LLC, ULX
Manager, LLC,
and UnitedLex Corporation*